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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM MEDINA,

Defendant.

Case No.: CR 19-0571 EMC

**DEFENDANT'S SENTENCING
MEMORANDUM**

Court: Courtroom 5, 17th Floor
Hearing Date: February 19, 2020
Hearing Time: 2:30 p.m.

The defendant stands before the Court to be sentenced for selling \$20 of heroin to an undercover police officer in the Tenderloin. As with virtually of these cases, the defendant is a citizen of Honduras who grew up in poverty, and came to this country to try to find a better life. He had a difficult time doing so because of his illegal status, and like many similarly situated individuals he was recruited to sell drugs on the street and was paid a very small sum each day to do so. He has no prior arrests or convictions, and will be deported back to Honduras as soon as he is done serving his sentence. This is an incredibly severe penalty in and of itself, considering the hardship he endured getting to this country.

For the reasons set forth in the PSR, the appropriate sentence is a sentence of time served. Mr. Medina as served 3 months in custody, and this is adequate punishment for this minor offense.

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2 Dated: February 14, 2020

Respectfully submitted,

3 STEVEN G. KALAR
4 Federal Public Defender
5 Northern District of California

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8 Chief Assistant Federal Public Defender
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